



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 19, 2023

Via ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Neil Cole*, 19 Cr. 869 (ER)

Dear Judge Ramos:

The Government writes in opposition to defendant Neil Cole's request to reduce the cash security condition of his bond from \$1 million to \$ \$209,800. The Court should reject Cole's application for two reasons.¹

First, Cole already agreed to the continuation of his existing bond as a condition of the Government consenting to bail pending appeal. *See* Dkt. 290 ("The parties have conferred and reached an agreement as to bail pending appeal. The government has agreed that, provided Mr. Cole continues to comply with his conditions of release, pursuant to the Appearance Bond and Order Setting Conditions of Release filed in this case (ECF No. 17), the government consents to bail pending appeal.").

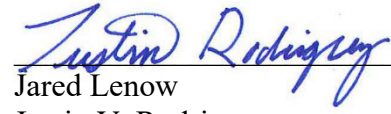
Second, the need for the existing bond conditions has only increased following sentencing. The existing bail conditions were set prior to Cole's conviction and sentencing; now Cole has been convicted and this Court has imposed an 18-month prison term. These developments have increased Cole's risk of flight.

¹ The Government apologizes for the late submission of this response.

Respectfully submitted,

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cc: Counsel for record (by ECF)